

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

JOHN DOE,

Plaintiff,

-against-

WASHINGTON AND LEE UNIVERSITY,

Defendant.

X

:

:

:

:

:

:

:

:

:

X

Civil Action No:


PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

The Plaintiff, by counsel, moves for a temporary restraining order and preliminary injunction enjoining defendant Washington & Lee University (i) from dismissing Plaintiff during the pendency of the instant Motion and the underlying action; (ii) requiring Defendant to reinstate Plaintiff during the pendency of the instant Motion and the underlying action if his dismissal has occurred, and (iii), granting such other and further relief as the Court shall deem just and equitable.

Plaintiff's final examinations are scheduled December 15-19, 2014.

John Doe

By:


David G. Harrison, Of Counsel

David G. Harrison, Esq.
(VSB #17590
The Harrison Firm, PC
5305 Medmont Cir SW
Roanoke, VA 24018-1120
(540) 777-7100
david@harrisonfirm.us

-and-

Andrew T. Miltenberg, Esq.
(NY Bar No. 2399582)
Kimberly C. Lau, Esq.
(NY Bar No. 4502241)
Nesenoff & Miltenberg, LLP
363 Seventh Avenue, Fifth Floor
New York, New York 10001
(212) 736-4500
amiltenberg@nmlplaw.com
klau@nmlplaw.com
(*pro hac vice* to be applied for)

Attorneys for Plaintiff John Doe

CERTIFICATE

I certify that on December 13, 2014, I deposited in the United States mail, postage prepaid, a copy of the foregoing Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction, the related Witness 1 Statement and article referred to as "Exhibit H" in Witness 1 Statement, and Memorandum of Law In Support of plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction, to the following persons as their names and titles appear, and at the address as it appears, on the Web Site of Washington & Lee University:

Leanne M. Shank
General Counsel
Washington & Lee University
204 W Washington St
Lexington, VA 24450-2116

Jennifer Kirkland
Associate General Counsel
Washington & Lee University
204 W Washington St
Lexington, VA 24450-2116

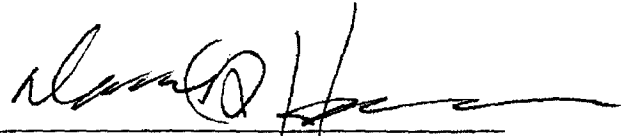
Jana Shearer
Staff Attorney
Washington & Lee University
204 W Washington St
Lexington, VA 24450-2116

I further certify that on the same date I sent copies of each of the above by email to the following persons and their names and titles appear, at the email address as it appears, on the Web Site of Washington & Lee University.

Leanne M. Shank
General Counsel
Washington & Lee University
lshank@wlu.edu

Jennifer Kirkland
Associate General Counsel
Washington & Lee University
jkirkland@wlu.edu

Jana Shearer
Staff Attorney
Washington & Lee University
jshearer@wlu.edu



David G. Harrison